

Miller Media Group

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Randal J. Miller, President



April 28, 2017

To: The Federal Communications Commission
Re: MB Docket # 17-106, main studio rule

Dear Commissioners:

These comments are being submitted by Randal J. Miller, president of Kaskaskia Broadcasting, Inc., licensee of WTIM (AM) Assumption, IL; WSVZ (FM) Tower Hill, IL; WHOW (AM) Clinton, IL; WEZC (FM) Clinton, IL; and several FM translators that simulcast either WTIM or HD Radio programming. I am also president of Miller Communications, Inc., licensee of WMKR (FM) Pana, IL; WRAN (FM) Taylorville, IL; and several FM translators that simulcast either WTIM or HD Radio programming.

We are in support of the recent FCC Notice of Proposed Rulemaking to eliminate the main studio rules for AM and FM broadcast radio stations, including the staffing and program origination requirements.

This is 2017. This is the electronic and digital era. It is RARE that a person comes to any of our buildings seeking information on our stations or submitting information to air. Most, if not all, of that communication is by e-mail, thru our web sites, or by phone.

Eliminating the costs for the associated staffing and program origination capability requirements, will enable us as well as other small market broadcasters to allocate greater resources to programming.

The main studio rule is archaic and should be totally scrapped.

We urge the Commission to completely eliminate this rule that time has definitely passed, and thank you for your consideration.